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September 18, 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: MM Docket No. 97-130
RM-8751

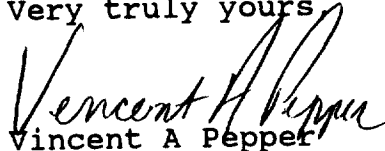
DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Transmitted herewith on behalf of Gillbro Communications Limited Partnership, the licensee of Radio Station KTWA(FM), Ottumwa, Iowa, is an original and four (4) copies of its Reply Comments concerning the above-referenced proceeding.

Should any further information be desired in connection with this matter, please communicate with this office.

Very truly yours,


Vincent A. Pepper

Enclosures (5)

cc: Sharon P. McDonald, Esq. - FCC (w/encl)
Dawn M. Sciarrino, Esq. (w/encl)
Donald E. Ward, Esq. (w/encl)

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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

SEP 18 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of § 73.202(b)) Docket No. 97-130
Table of Allotments)
FM Broadcast Stations) RM-8751
(Galesburg, Illinois))

To: Chief, Allocations Branch

REPLY COMMENTS OF GILLBRO COMMUNICATIONS LIMITED PARTNERSHIP

COMES NOW, Gillbro Communications Limited Partnership ("Gillbro"), the licensee of Station KTWB(FM), Ottumwa, Iowa, by its attorneys, hereby respectfully submits its Reply Comments to the Further Comments filed by Galesburg Broadcasting Company ("Galesburg") in the above-captioned proceeding. In its Further Comments, Galesburg made several incorrect statements of law, and provides misleading engineering information that merits response.

I. INTRODUCTION

Gillbro filed its application for a one-step upgrade on March 22, 1996. In accordance with Commission policy, this application was treated as a counter-proposal to Galesburg's Petition for Rule Making, which was filed on January 16, 1996.

The Commission released a Notice of Proposed Rulemaking on May 16, 1997, noting that the application of Gillbro's and the Petition for Rulemaking by Galesburg were mutually exclusive. As such, the Commission requested both parties provide an engineering analysis discussing the gain area created by their proposal, along with any potential loss area created by amending the FM Table of Allotments.

Gillbro filed its engineering information on August 18, 1997, and Galesburg filed its Motion to Accept Further Comments, and Further Comments of Galesburg Broadcasting Company on September 3, 1997. It is to these Further Comments that Gillbro now responds.

II. ENGINEERING DATABASE

In its Further Comments, Galesburg makes several misstatements with regard to the information contained in the FCC database. First, Galesburg's attorney and engineer both state that the Commission database refers to Gillbro's authorized channel as a Class C3 allotment. However, a print-out from the FCC database, attached as Exhibit 1, clearly shows the current channel allotment for Station KTWA(FM) as a Class A station.

Perhaps both Galesburg's attorney and engineer were referring to the Table of Allotments contained in the Commission's Rules, wherein Ottumwa, Iowa is allotted Channel 224C3. 47 C.F.R. § 73.202 (1996) Gillbro informed the Commission in 1992 that was unable to construct a Class C3 station at the present site, and forfeited its construction permit. Numerous correspondence with the Commission, which are a matter of public record, relate to this forfeiture, and further discussion in this pleading is not necessary. It suffices to state that the current information in the FCC database lists Station KTWA(FM) as a Class A station.

Further, Galesburg argues that the FCC database lists KOTM-FM as having a pending application to upgrade to a Class C3 station, and sought to include this in the measure of services available to

the KTWA(FM) increased service area. Whereas this argument ignores clear FCC precedent for not considering pending applications when determining the number of services, the larger issue is displayed in Exhibit 2. The one-step upgrade for Station KOTM-FM was granted on March 26, 1997, over 5 months prior to Galesburg's pleading. However, Galesburg refers to this application as pending and uses this to raise doubts as to the veracity of Gillbro's engineering information. While it is true that KOTM-FM was left out of Gillbro's prior engineering exhibit, the impact of counting this station is minimal, and certainly not decisive in considering the upgrade application for Station KTWA(FM). Both the public notice granting this application, and a printout from the FCC database, are provided for ease of reference.

From these two examples, it is clear that Galesburg is attempting to cloud the engineering information contained in Gillbro's pleadings. However, as shown above, both attempts fail to correctly state the current status of the FCC database. Therefore, Gillbro submits that, perhaps, the focus should be shifted onto Galesburg's pleading to examine its accuracy.

III. LEGAL ARGUMENTS

A. The Proper Definition of "Maximum Facilities"

Galesburg attempts to redefine FCC precedent in arguing that the correct analysis is to consider Gillbro's upgrade application as being from Class C3 to C2, rather than Class A to Class C2. In doing so, it misstates Commission precedent, and further displays

the lengths that it will go to in its failing attempt to block the clearly superior proposal.

Galesburg argues that the proper comparison is based on Gillbro's upgrade from a Class C3 station to a Class C2 station. As discussed above, Galesburg apparently rests this argument on the Table of Allotment's assignment of 224C3 to Ottumwa, Iowa. To offer support for its argument, Galesburg argues that Albany, Georgia; Marianne & Quincy, Florida, 4 FCC Rcd 2631 (1989) stands for the position that "'vacant' allotments are considered as providing service in determining the extent of incremental coverage gains." Further Comments, n.3. As such, it argues that, since Ottumwa, Iowa is allotted Channel 224C3, the upgrade application for Station KTWA(FM) must be from a Class C3 to Class C2, rather than its existing facilities, which is a Class A station, as found in the FCC Database. However, in quoting Albany, Galesburg fails to quote the entire sentence, and takes that portion which it does cite out of context.

In Albany, the Commission compared conflicting proposals for the substitution of channels in the respective communities. In order to compare the facilities to determine their comparative standing, the Commission stated that its policy "for deciding whether an area is served by a full-time aural service is to consider the coverage based on an assumption of maximum facilities for FM station and vacant allotments of a given class. Albany, 4 FCC Rcd 2631 ¶ 8 (emphasis added). In Galesburg's pleading, it failed to note that the comparison is restricted to the "given" class, and

attempted to cite this statement as justification for treating Station KTWB as a Class C3 station. This position is clearly without precedent, and conflicts with a long line of cases that define "maximum facilities" as the maximum allotted power and antenna height for the current and proposed class of station.^{1/} There is no support for the argument that "maximum facilities" is defined as the maximum facilities allotted on the Table of Allotments, and, therefore, Galesburg's argument must be disregarded.

Further, even if this clearly erroneous definition were accepted by the Commission, Galesburg's position is still untenable. First, Galesburg's pleading and related engineering report is based on the placement of Station KTWB(FM)'s antenna at a hypothetical site some five miles from its present site. This site has not been shown to be available for the placement of a tower, has not been shown to be determined by the Federal Aviation Administration to not cause a hazard to aviation, has not been shown that it complies with local or state zoning regulations, nor has it been shown that this site is environmentally suitable for the construction of a tower. For all Galesburg, and the Commission, is aware, this unreferenced, hypothetical site could be in the middle of an airport runway, or in the middle of a high school football field.

^{1/} These figures are contained in the Commission's Rules. 47 C.F.R. § 73.211 (1996). See e.g. Oxford and New Albany, Mississippi, 3 FCC Rcd 615, ¶ 8 (1988), Spring Grove and Preston, Minnesota and Mason City, Iowa, 4 FCC Rcd 5738, ¶ 5 (1989).

However, even assuming that Galesburg is successful in redefining "maximum facilities," and is also successful in specifying a tower site that fully complies with FCC, FAA, state, and local zoning and environmental regulations, Gillbro's proposal is still superior to that of Galesburg. As shown below, when Station KOTM-FM is included into the number of full-time services, Gillbro's proposal continues uniquely to offer significant service to underserved areas.

B. Gillbro's Service to Underserved Areas

In its pleading, Galesburg alleges that two stations were not included in Gillbro's engineering study. The result, Galesburg argues, is the reclassification of the proposed service provided by Station KTWA(FM).

According to Galesburg's pleading, Gillbro's engineering failed to include Stations WHO(AM), Des Moines, IA and KOTM-FM, Ottumwa, IA. However, as shown in the attached engineering report, Station WHO(AM) was included in the study. Further, while the upgraded KOTM-FM was not included in the study, its impact on Gillbro's proposed service is de minimis. Gillbro's proposal still provides a significant portion of the population its fourth service, and an even larger number, its fifth service.^{2/}

^{2/} Service to underserved areas, those receiving four or less aural services, is the initial comparison criteria when reviewing competing proposals. See Seymour and Pigeon Forge, Tennessee, 2 FCC Rcd 2016 (1987), Springdale, Arkansas; Carthage, Aurora and Willard, Missouri, 2 FCC Rcd 6690 (1987), Benton, Clarksville et. al., 7 FCC Rcd 2555 (1992), Douglas, Georgia and LaCrosse, Florida, 10 FCC Rcd 2870 (1995), Northwye, Cuba.

The attached engineering report displays that, even with the inclusion of Station KOTM-FM, the upgrade of Station KTWa(FM) from a Class A to a Class C2 station will provide 361 persons with their fourth service, and 8,656 persons with their fifth service. Overall, an additional 46,707 persons will be reached by this upgrade. If the Commission were to determine that Galesburg is correct, and that "maximum facilities" somehow would make the upgrade a request from a Class C3 to a Class C2 station, 361 persons would still begin receiving their fourth service, and 8,440 persons would receive their fifth service.

As such, under either Gillbro's upgrade proposal, or Galesburg attempt to redefine "maximum facilities," a significant portion of the underserved population would receive Station KTWa. (9,017 vs. 8,801) By contrast, Galesburg's proposal would only provide a fifth service to 13 persons. However, it would remove service from 1,993 persons in the effort to provide service to these 13 persons.

Therefore, even were the Commission to redefine "maximum facilities," Gillbro's proposal would be superior since it will provide a significant portion of the underserved population with a service previously unavailable.

IV. CONCLUSION

As shown above, Galesburg's Further Comments fail to properly interpret the FCC database, or FCC precedent. Station KTWa(FM) is

Waynesville, Lake Ozark, and Eldon, Missouri, 7 FCC Rcd 1449 (1992), Blanchard, Louisiana and Stephens, Arkansas, 8 FCC Rcd 7083 (1993) aff'd 10 FCC Rcd 9828 (1995).

considered a Class A station by the Federal Communications Commission, and Galesburg's attempt to re-classify KTWA(FM) as a Class C3 station must fail.

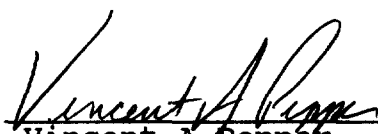
Further, Gillbro has effectively shown that its proposal to upgrade its facilities from a Class A to a Class C2 station will offer service to presently underserved areas. Even if Galesburg's position were affirmed by the Commission, Gillbro will still provide greater service to underserved areas, which must be decisional for the Commission's staff.

Finally, if the underserved areas are not considered, Gillbro's overall increased service is still considerably larger than that which is proposed by Galesburg, and therefore, merits authorization by the Commission.

Accordingly, Gillbro Communications Limited Partnership hereby requests that the Federal Communications Commission grant its upgrade application, and deny the competing proposal of Galesburg Broadcasting Company.

Respectfully submitted,

**Gillbro Communications
Limited Partnership**

By 
Vincent A. Pepper
Its Attorney

PEPPER & CORAZZINI, L.L.P.
1776 K Street, N.W., Suite 200
Washington, D.C. 20006
(202) 296-0600

September 18, 1997

Exhibit 1
Gillbro Communications
Limited Partnership

Excerpt from FCC Database

Federal Communications Commission**Mass Media Bureau****Audio Services Division**

KTWA Ottumwa IA US
224C2 92.7 MHz BPH960322IC APP
Owner: Gillbro Communications Limited Partnership

N Lat 41 1 29
W Lon 92 28 9

HERP	50.000 kW	HHAAT:	97.0 m	HRCAMSL:	331.0 m
VERP	50.000 kW	VHAAT:	97.0 m	VRCAMSL:	331.0 m

73.215 applicant

Non directional
No beam tilt

KTWA Ottumwa IA US
224A 92.7 MHz BLH860619KA License
Owner: Gillbro Communications Limited Partnership

N Lat 41 1 29
W Lon 92 28 9

HERP	3.000 kW	HHAAT:	100.0 m	HRCAMSL:	334.0 m
VERP	3.000 kW	VHAAT:	100.0 m	VRCAMSL:	334.0 m

Non directional
No beam tilt

*If you have any corrections to the engineering database
or you have discovered an error in the database, please contact
Gary Kalagian at 202-418-2789 or send [Gary, gkalagai@fcc.gov](mailto:gkalagai@fcc.gov) an E-mail.*

*If you have any suggestions about this page please,
send your comments to [William Ball. wball@fcc.gov](mailto:wball@fcc.gov)*

☐ [Back to FM Query](#)

Exhibit 2
Gillbro Communications
Limited Partnership

Excerpt from FCC Database and Public Notice

Federal Communications Commission**Mass Media Bureau****Audio Services Division**

KOTMFM Ottumwa IA US
249C3 97.7 MHz BPH961118IF Construction Permit
Owner: FMC Broadcasting, Inc.

N Lat 41 1 28
W Lon 92 28 56

HERP 18.500 kW HHAAT: 116.0 m HRCAMSL: 353.0 m
VERP 18.500 kW VHAAT: 116.0 m VRCAMSL: 353.0 m

73.215 applicant

Non directional
No beam tilt

KOTMFM Ottumwa IA US
249A 97.7 MHz BMLH970414KC APP
Owner: FMC Broadcasting, Inc.

N Lat 41 1 27
W Lon 92 28 56

HERP 3.000 kW HHAAT: 52.0 m HRCAMSL: 288.0 m
VERP 3.000 kW VHAAT: 52.0 m VRCAMSL: 288.0 m

Non directional
No beam tilt

KOTMFM Ottumwa IA US
249A 97.7 MHz BLH6880 License
Owner: FMC Broadcasting, Inc.

N Lat 41 1 27
W Lon 92 28 56

HERP 3.000 kW HHAAT: 52.0 m HRCAMSL: 288.0 m
VERP 3.000 kW VHAAT: 52.0 m VRCAMSL: 288.0 m

Non directional
No beam tilt

MN BPH	-970218JD	KUSZ 107.7 MHZ	BEFERA BROADCASTING, INC. PROCTOR, MN	APPLICATION GRANTED TO FM BROADCAST STATION REPLACEMENT OF (BPH-950208IC)
MO BLH	-950830KD	KAHR 96.7 MHZ	EAGLE BLUFF ENTERPRISES POPLAR BLUFF, MO	APPLICATION GRANTED LICENSE OR LICENSE MODIFICATION FOR FM BROADCAST STATION LICENSE TO COVER (BPH-950502IA) FOR CHANGES
NY BLFT	-970123TH	W201BE 88.1 MHZ	CALVARY CHAPEL OF TWIN FALLS BUFFALO, NY	APPLICATION GRANTED LICENSE OR LICENSE MODIFICATION FOR FM TRANSLATOR LICENSE TO COVER (BPFT-950630TE) FOR A NEW STATION
TN BLED	-961231KA	WDVX 89.9 MHZ	CUMBERLAND COMMUNITIES COMMUNI CORP. CLINTON, TN	APPLICATION GRANTED LICENSE OR LICENSE MODIFICATION FOR NON-COMMERCIAL EDUCATIONAL FM LICENSE TO COVER (BPED-920331MC) FOR A NEW STATION
TX BPH	-970219JA	KXTM 107.7 MHZ	HUMBERTO LOPEZ D/B/A BENAVIDES COMM BENAVIDES, TX	APPLICATION GRANTED TO FM BROADCAST STATION REPLACEMENT OF (BPH-921022MG)

A C T I O N O F : March 26, 1997

CA BP	-970218AF	KURS 1040 KHZ	QUETZAL BILINGUAL COMMUNICATIONS INC SAN DIEGO, CA	APPLICATN DISMISSED TO AM BROADCAST STATION CP CHNG PWR. TL & ANT. SYSTEM APP DISMISSED 3/26/97 PER LTR 1800B2-JBS
CA BPFT	-960816TF	K219DF 91.7 MHZ	AMERICAN FAMILY ASSOCIATION WASCO, CA	APPLICATION GRANTED TO FM TRANSLATOR CP NEW STATION, PRIMARY STATION WAFR(FM)
CA BPFT	-960828TA	K213CG 90.5 MHZ	STOCKTON CHRISTIAN LIFE COLLEGE, INC LIVERMORE, CA	APPLICATION GRANTED TO FM TRANSLATOR CP TO CHANGE CHANNEL TO 213, 90.5 MHZ, (MAJOR CHANGE) (ENGINEERING AMENDMENT FILED (BPFT-961001TA))
CA BPFT	-961007TA	K212EP 90.3 MHZ	CALVARY CHAPEL OF TWIN FALLS, INC. LANDERS, CA	APPLICATION GRANTED TO FM TRANSLATOR CP NEW STATION, PRIMARY STATION KAWZ(FM)
CO BPFT	-960930TE	K220GA 91.9 MHZ	GREAT PLAINS CHRISTIAN RADIO LAMAR, CO	APPLICATION GRANTED TO FM TRANSLATOR CP NEW STATION, PRIMARY STATION KJIL(FM) (ENGINEERING AMENDMENT FILED (970103TG))

FL BMP	-961108AB	WTMP 1150 KHZ	WTMP RADIO, LTD TEMPLE TERRACE, FL	APPLICATN RETURNED TO AM BROADCAST STATION MOD OF CP TO CHNG CITY OF LIC, TL & ANT. SYSTEM APP IS RETURNED PER 1800B2-HKC LETTER 3/26/97
GA BALH	-961223GI	WLRR 100.7 MHZ	PRESTON W. SMALL MILLEDGEVILLE, GA	APPLICATION GRANTED TO FM BROADCAST STATION VOLUNTARY ASSIGNMENT OF LICENSE FROM: PRESTON W. SMALL TO: SCOTTS TRAIL RADIO, INC. (FORM 314) OPPOSITION TO INFORMAL COMPLAINT, FILED 3/6/97 INFORMAL OBJECTION DENIED AND APPLICATION GRANTED BY LETTER DATED 3-26-97, 1800B2-AJS
GA BPFT	-960830TC	W276AZ 103.1 MHZ	FAMILY STATIONS, INC. SAVANNAH, GA	APPLICATION GRANTED TO FM TRANSLATOR CP TO CHANGE CHANNEL TO 276, 103.1 MHZ, ANTENNA SYSTEM AND EQUIP (MAJOR CHANGE) (ENGINEERING AMENDMENT (961219TC))
IA BPH	-961118IF	KOTM-FM 97.7 MHZ	FMC BROADCASTING, INC. OTTUMWA, IA	APPLICATION GRANTED TO FM BROADCAST STATION ONE STEP APPLICATION
MD BPH	-950130IE	WKGO 106.1 MHZ	WTBO-WKGO CORP., L.L.C. CUMBERLAND, MD	APPLICATION GRANTED TO FM BROADCAST STATION CP TO CHANGE ERP: 5.5 KW H&V
MN BPFT	-961003TD	K296ER 107.1 MHZ	MINNESOTA VALLEY CHRISTIAN RADIO MANKATO, MN	APPLICATION GRANTED TO FM TRANSLATOR CP NEW STATION, PRIMARY STATION KJLY(FM)
MO BMPED	-960802IA	KTTK 90.7 MHZ	LEBANON EDUCATIONAL B/C FOUNDATION LEBANON, MO	APPLICATION GRANTED TO NON-COMMERCIAL EDUCATIONAL FM MOD OF CP TO CHG HAAT AND TL
NE BPFT	-960816TB	K202CJ 88.3 MHZ	GRACE UNIVERSITY DESHLER, NE	APPLICATION GRANTED TO FM TRANSLATOR CP NEW STATION, PRIMARY STATION KROA(FM) ENGINEERING AMENDMENT (970108TA)
OR BPFT	-961003TB	K249DH 97.7 MHZ	PENSACOLA CHRISTIAN COLLEGE SALEM, OR	APPLICATION GRANTED TO FM TRANSLATOR CP NEW STATION, PRIMARY STATION WPCS(FM)
PR BP	-961125AE	WPRA 990 KHZ	WPRA, INC. MAYAGUEZ, PR	APPLICATION GRANTED TO AM BROADCAST STATION CP TO CHNG TL & POWER

ORIGINAL

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of GILLBRO COMMUNICATIONS LIMITED PARTNERSHIP ("Gillbro") in support of its Reply Comments in MM Docket No. 97-130, RM-8751.

In this proceeding Galesburg Broadcasting Company ("Galesburg"), the licensee of WGBQ(FM), Galesburg, Illinois, has proposed to change from Channel 224A to Channel 224B1, and Gillbro, the licensee of KTWA(FM), Ottumwa, Iowa, has proposed to change from Channel 224A to Channel 224C2. Both parties have provided data on the populations and areas that would be newly served. In addition, Gillbro provided information on the underserved areas that would be newly served by each proposed facility.

In its Further Comments, Galesburg claims that certain errors exist in the data provided in the Gillbro Comments. These allegations are discussed as follows.

Galesburg faults Gillbro for not considering among other services WHO, Des Moines, Iowa, which operates on 1040 kHz with 50 kw, nondirectional. However, WHO was included in the study but was not listed or identified as serving the entire proposed service area of KTWA. Thus, with respect to this station, the previously submitted data is correct but for the omission of a reference to it.

In addition, Galesburg contends that Gillbro should have included among the other services KOTM-FM, Ottumwa, since this Class A station has a pending application for Class C3 facilities. We had not considered KOTM-FM, because its Class A facility did not impact upon the study, and because its Class C3 facility was only a proposal. However, contrary to the

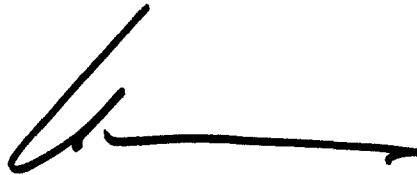
contention of Galesburg, the KOTM-FM Class C3 application was granted after the Gillbro showing was prepared, so it is now an authorized facility and should be included in our showings. On this basis, we attach hereto revisions of Figures 2, 4, and 6 from the Gillbro Comments, which now include the effects of the KOTM-FM Class C3 operation. As indicated, the Gillbro proposal continues to afford service to significant underserved areas.

Finally, Galesburg argues that Gillbro should have compared its proposed operation with a hypothetical Class C3 operation located at the reference site specified by Galesburg, which is some five miles west of the existing KTWA site. Although Gillbro believes the proper comparison is with a full-facility Class A operation, since KTWA is a Class A station, we have considered the effect on the data if this assumption were made. We find that there would continue to be a net increase in service to 361 persons in 32 square miles who receive only three other aural services, and a net increase in service to 8,440 persons in 144 square miles who receive only four other services. Thus, even if this incorrect approach were used, Gillbro would still be seen to provide a new service to a substantial underserved population.

Of course, these figures are entirely hypothetical. KTWA could not operate at its present site with Class C3 facilities if Galesburg's proposal is adopted, so we have assumed a maximum Class C3 facility at the reference coordinates shown in the *Notice*. We have no reason to believe that this reference site would actually be available to Gillbro, or that the FAA would issue a Determination of No Hazard for a tower of suitable height at this location, or that local ordinances would permit such construction. Therefore, any data based on a facility at this site is entirely speculative. Still, the data, hypothetical though it may be, continues to demonstrate that the Gillbro proposal would result in significant service to underserved areas, whereas

such service under the Galesburg proposal would be *de minimis*.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, consisting of a stylized 'N' followed by a horizontal line.

NEIL M. SMITH

September 17, 1997

SECTIONAL AERONAUTICAL CHART
SCALE 1:500,000

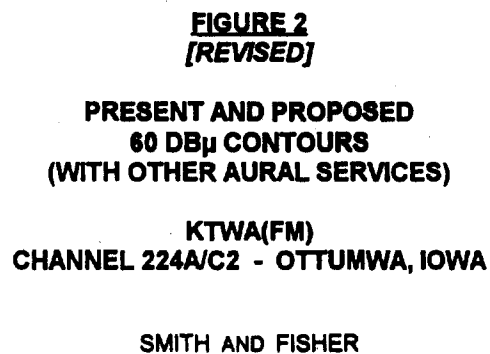


FIGURE 4
[REVISED]**STATIONS INCLUDED IN COMPARATIVE
COVERAGE ANALYSIS****KTWA(FM) - OTTUMWA, IOWA**

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Power (kw)</u>	<u>HAAT (feet)</u>
KRKN	Eldon, Iowa	282C3	23.5	341
KKSI	Eddyville, Iowa	268C2	49	499
KLBA-FM	Albia, Iowa	244C3	10	509
KXOF	Bloomfield, Iowa	292C3	8.7	377
KIIK-FM	Fairfield, Iowa	240A	4.1	400
KCWN	New Sharon, Iowa	260C3	25	282
KIGC	Oskaloosa, Iowa	204A	0.23	121
KBOE-FM	Oskaloosa, Iowa	285A	50	492
KMGO	Centerville, Iowa	254C1	100	449
KRLS	Knoxville, Iowa	221C3	15.5	308
KMEM-FM	Memphis, Missouri	263C3	25	299
KSKB	Brooklyn, Iowa	256C2	50	203
KILJ-FM	Mt. Pleasant, Iowa	288C3	24	338
KRXL	Kirksville, Missouri	233C	100	1010
KRTI	Grinnell, Iowa	294C2	50	492
KAZR	Pella, Iowa	277C1	100	745
KTUF	Kirksville, Missouri	279C2	50	492

FIGURE 4
[REVISED]

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Power (kw)</u>	<u>HAAT (feet)</u>
KRNA	Iowa City, Iowa	231C1	100	981
KKDM	Des Moines, Iowa	298C1	100	722
KOKX-FM	Keokuk, Iowa	237C1	100	981
KIOA-FM	Des Moines, Iowa	227C	100	1063
KGGO	Des Moines, Iowa	235C	100	1066
KSUI	Iowa City, Iowa	219C	100	1293
KLYF	Des Moines, Iowa	262C	100	1699
KOTM-FM	Ottumwa, Iowa	249C3	18.5	381
KCOG(AM)	Centerville, Iowa	1400 kHz	0.5	
KXEL(AM)	Waterloo, Iowa	1540 kHz	50	
WMT(AM)	Cedar Rapids, Iowa	600 kHz	5	
WHO(AM)	Des Moines, Iowa	1040 kHz	50	

FIGURE 6
[REVISED]

POPULATION AND AREA DATA
 PROPOSED KTWA(FM)
 CHANNEL 224C2 - OTTUMWA, IOWA

	<u>Population</u>	<u>Area</u>	
		<u>(sq. km.)</u>	<u>(sq. mi.)</u>
Present	47,601	2,591	1,000
Proposed	94,308	6,114	2,361
Change	+ 46,707	+ 3,523	+ 1,361

Within Gain Area:

No other services	--	--	--
1 other service	--	--	--
2 other services	--	--	--
3 other services	361	32	12
4 other services	8,656	174	67
5 or more other services	37,690	3,317	1,281

CERTIFICATE OF SERVICE

I, Lisa A. Skoritoski, a secretary in the law firm of Pepper & Corazzini, L.L.P., do hereby certify that on this 18th day of September, 1997, copies of the foregoing Reply Comments of Gillbro Communications Limited Partnership were mailed, postage prepaid, to the following:

Dawn M. Sciarrino, Esq.
Fisher Wayland Cooper Leader
& Zaragoza, L.L.P.
2001 Pennsylvania Avenue, N.W.
Suite 400
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(counsel to Galesburg Broadcasting Co.)

Sharon P. McDonald, Esq. *
Mass Media Bureau
Allocations Branch
Federal Communications Commission
2000 M Street, NW
Room 569
Washington, DC 20554

*Indicates Hand Delivery

A handwritten signature in cursive script, reading "Lisa A. Skoritoski", is written over a horizontal line.

Lisa A. Skoritoski